

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

Conditional Major Draft Permit No. F-04-006

Sargent & Greenleaf Inc.

One Security Drive, Nicholasville, Kentucky

June 20, 2003

REVIEWER: Sajjad Quabili

Plant I.D. 21-113-00014

Application Log # 54535

**PERMITTING BACKGROUND:**

Sargent and Greenleaf Inc. is an existing source. The source applied for the renewal of their Conditional Major air quality permit. The source is potentially major for a single HAP, trichloroethylene (TCE).

A public notice was advertised on January 23, 2003 for public comments to issue a draft permit for the renewal of the source's conditional major permit. No comments were received either from the public or from the source. During the issuance of the final permit, the Division has found that the source operates a vapor degreaser instead of cold TCE cleaner. 40 CFR 63, Subpart T, is applicable to the vapor degreaser. The draft permit has been changed to reflect the new requirements of the MACT standards. Therefore, the draft permit must be re-advertised for public comments.

**COMMENTS:**

Source wide TCE emissions shall not exceed 9 tons per year. An automatic tank cover has been added to the open top vapor degreaser unit (emission point #5).

**APPLICABLE REGULATIONS:**

The die casting operations are subject to 401 KAR 59:010, new process operations. Due to the processing rates, all PM emissions from these operations will be within the established allowable listed in the regulation.

The halogenated solvent cleaning operation is subject to Maximum Available Control Technology (MACT) standards 40 CFR 63, Subpart T.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.